

# EXHIBIT 15



Jeremy Sadkin &lt;jsadkin@gmail.com&gt;

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**Re: APP99614 Notice of Complaint**

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Joe Allen &lt;joeallenpro@me.com&gt;

Wed, Jul 18, 2018 at 7:35 PM

To: AppStoreNotices &lt;AppStoreNotices@apple.com&gt;

Cc: jsadkin@gmail.com, nmazanitis@curtis.com, GHowison@munckwilson.com

Dear James,

I am unaware of any order by a US court that enjoins me or my company from selling our AutoPrompter app. I will have my attorney look into this issue with immediate attention.

Sincerely,  
Joe

On Jul 18, 2018, at 06:27 PM, AppStoreNotices <AppStoreNotices@apple.com> wrote:

Dear Matthew and Joe,

**\*\*Please include APP99614 in the subject line of any future correspondence on this matter.\*\***

On 7/17/2018, we received a notice from Belleau Technologies, LLC ("Complainant") that Complainant believes the app listed below infringes its intellectual property rights. In particular, Complainant believes you are infringing its patent. Please see their comments below.

Developer: JoeAllenPro Limited  
Provider: JoeAllenPro Limited  
App Title: AutoPrompter  
Apple ID: 1251862987

Comments from Complainant: On Thursday July 12, 2018, Belleau Technologies filed a complaint in United States District Court in the Southern District of New York alleging, among other things, patent infringement against JoeAllenPro Limited and against Joe Allen personally (the creator of the AutoPrompter app). Belleau alleged, among other things, that Joe Allen's AutoPrompter app infringed Belleau's U.S. Patent Number 9,953,646.

Today, July 17, 2018, Belleau moved the court by order to show cause for emergency injunctive relief, which motion was granted at approximately 5pm EDT.

The order enjoins Joe Allen, JoeAllenPro Limited, and any other person acting in concert with them from "making, selling, distributing, marketing, testing, importing, offering to sell, or otherwise using a software product called 'AutoPrompter' - or any other similar infringing software application - within the United States."

Apple is hereby on notice that offering AutoPrompter in the App Store would represent a breach of the express terms of the July 17 Order.

Accordingly, Belleau requests that Apple immediately remove the AutoPrompter app from all App Store localities in which it is available for Pre-Order and to cancel the pre-planned release of the AutoPrompter app, which Joe Allen has slated for tomorrow, July 18, 2018.

I do not see a way to attach documentation, so I have elected to include a shared cloud link to an electronic copy of the Order, which was personally served upon me when I appeared before the Court for purposes of Belleau's motion (along with a representative of Belleau's retained counsel, Nicole Mazanitis).

[https://drive.google.com/open?id=1sZJJ6YTfMY\\_zowXKm1V8FkgVMfbAKR\\_M](https://drive.google.com/open?id=1sZJJ6YTfMY_zowXKm1V8FkgVMfbAKR_M)

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You can reach Complainant through Jeremy Sadkin (email: [jsadkin@gmail.com](mailto:jsadkin@gmail.com)), or Nicole Mazanitis (email: [nmazanitis@curtis.com](mailto:nmazanitis@curtis.com)), copied on this email. Please exchange correspondence directly with Complainant.

We look forward to receiving written assurance that your application does not infringe Complainant's rights, or that the parties are taking steps to promptly resolve the matter. Please keep us apprised of your progress.

Please note that during the course of this matter:

1. Correspondence to Apple must include the reference number noted above in the subject line and copy the other party. All correspondence sent to Apple may be shared with the other party.
2. Written assurance of rights may include confirmation that your application does not infringe Complainant's rights, an express authorization from Complainant, or other evidence acceptable to Apple, and should include documentation wherever possible.
3. Should you choose to remove your application (for example, while you make any necessary changes), visit iTunes Connect at <http://itunesconnect.apple.com> and access your app in the Manage Your Application module.
  - Access your app in the "My Apps" module
  - Click on the "Pricing and Availability" tab from the App Summary Page and select "Edit" by "Availability"
  - Select and deselect "All" territories to uncheck all App Store territories
  - Click on the "Done" button
4. Developers with a history of allegations of repeat infringement, or those who misrepresent facts to Apple and/or the Complainant are at risk of termination from the Developer Program.
5. Failure to respond to the Complainant or to take steps toward resolving a dispute may lead to removal of the app(s) at issue as in violation of the App Store Review Guidelines and/or the iOS Developer Program License Agreement. Please keep Apple apprised of your progress.

Thank you for your immediate attention.

Sincerely,

James

□ Apple Legal Apple One Apple Park Way Cupertino, CA 95014 [AppStoreNotices@apple.com](mailto:AppStoreNotices@apple.com)

The information in this e-mail and any attachment(s) is intended solely for the personal and confidential use of the designated recipients. This message may be an attorney-client communication protected by privilege. If you are not the intended recipient, you may not review, use, copy, forward, or otherwise disseminate this message. Please notify us of the transmission error by reply e-mail and delete all copies of the message and any attachment(s) from your systems. The use of the sender's name in this message is not intended as an electronic signature under any applicable law. Thank you.